

Application No.: 10/658082  
Docket No.: TP2685USNA

Page 7

### **REMARKS**

Claims 1-26 remain pending in the present application. Claims 15-26 stand withdrawn from consideration due to the restriction requirement previously issued by the Examiner. The amendment to claim 1 addresses in part the formal rejection, discussed below, and that to claim 4 corrects a typographical error. Description of the copolymers of claim 1 as "block, random or alternating" is supported at page 6, lines 22-25. No new matter is added.

### **Rejections under 35 U.S.C. §112**

Claims 3-5 stand rejected under 35 U.S.C. §112, second paragraph, as being indefinite. Applicants traverse this basis for rejection and respectfully request reconsideration and withdrawal thereof.

In all instances, the Examiner reads the claims to be broader than independent claim 1 as to the recitation of the amount of polymer adhesive. The phrase "at least 85% by weight of" has been deleted, since it was confusing and unnecessary.

The polymer adhesive of claim 1 can be a single ethylene copolymer, or a blend of ethylene copolymers, wherein each ethylene copolymer has from 50 to 95 wt% ethylene groups, and 5 to 50 wt% of at least one comonomer selected from esters or carboxylic acids. The copolymers can be terpolymers (claim 3), or di-polymers (claims 4 and 5). The subject matters of claims 3-5 specify the combinations and relative percentages of the individual monomers used in the polymeric adhesive copolymers of claim 1.

Accordingly, Applicants submit that the claims are definite.

### **Rejection under 35 U.S.C. §102(b)**

Claims 1, 2, 6-10, and 14 stand rejected under 35 U.S.C. §102(b) as anticipated by GB 2 284 152 (hereinafter GB '152). Applicants traverse this basis for rejection and respectfully request reconsideration and withdrawal thereof.

GB '152 discloses methods for manufacturing a tufted pile carpet using grafted copolymers as at least part of the adhesive compositions. The grafting monomers and their relative concentrations are set forth at page 9. Notably, the preferred range of grafted monomer is about 0.08-0.12 wt% (page 9, lines 30-31). GB '152 indicates

Application No.: 10/658082  
Docket No.: TP2685USNA

Page 8

that it is "particularly preferred" that the grafted copolymers be blended with un-grafted polymers (page 10, lines 8-15).

In contrast, the polymer adhesives of the present invention are any of block, random or alternating copolymers of at least 50 wt% ethylene monomer, polymerized with 5-50 wt% of at least one ester or carboxylic acid comonomer. According to the present claims, grafted copolymers are not included as components of the polymer adhesive. Withdrawal of the rejection is requested, as GB '152 clearly fails to anticipate the present claims.

**Rejection under 35 U.S.C. §103(a)**  
**over GB 2 284 152**

Claims 3-5 stand rejected under 35 U.S.C. §103(a) as obvious over GB '152. Applicants traverse this basis for rejection and respectfully request reconsideration and withdrawal thereof.

Claims 3-5 specify particular copolymers that must be present in the polymer adhesive of claim 1, none of which is a grafted copolymer. GB '152 requires at least one grafted-copolymer, and therefore cannot make obvious the present claims. Withdrawal of the rejection is requested.

**Rejection under 35 U.S.C. §103(a)**  
**over GB 2 284 152 in view of Higgs**

Claims 11 and 12 stand rejected under 35 U.S.C. §103(a) as obvious over of GB '152, in view of Higgs (US 4,522,857). Applicants traverse this basis for rejection and respectfully request reconsideration and withdrawal thereof.

Applicants reiterate the distinctions over GB '152, set forth above.

Higgs discloses carpet tile with stabilizing material embedded in an adhesive layer, wherein the stabilizing material can be a woven or nonwoven glass scrim (col. 1, lines 52-55). However, Higgs fails to disclose or suggest modifications to a copolymer adhesive that would cure the deficiencies of GB '152, and therefore cannot be said to present a *prima facie* case of obviousness as to the present claims, even in combination with GB '152. Withdrawal of the rejection is requested.

Application No.: 10/658082  
Docket No.: TP2685USNA

Page 9

**Rejection under 35 U.S.C. §103(a)**  
**over GB 2 284 152 in view of Higgens**

Claim 13 stands rejected under 35 U.S.C. §103(a) as obvious over GB '152, in view of Campbell et al. (US 3,867,188). Applicants traverse this basis for rejection and respectfully request reconsideration and withdrawal thereof.

Applicants reiterate the distinctions over GB '152, set forth above.

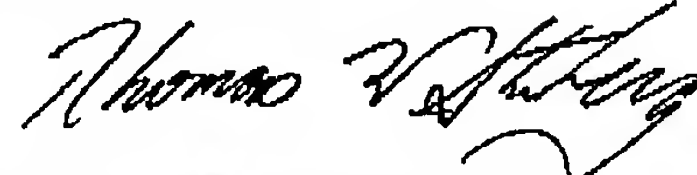
Campbell et al. discloses a spunbond nonwoven fabric having silicone-glycol copolymer thereon, used as a carpet backing (Abstract). However, Campbell et al. fail to disclose or suggest modifications to a copolymer adhesive that would cure the deficiencies of GB '152, and therefore cannot be said to present a *prima facie* case of obviousness as to the present claims, even in combination with GB '152. Withdrawal of the rejection is requested.

Application No.: 10/658082  
Docket No.: TP2685USNA

Page 10

In view of the foregoing, allowance of the above-referenced application is respectfully requested.

Respectfully submitted,



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Dated: \_\_\_\_\_

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TWS:fgl  
Enclosure